

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAMON DEJESUS CEDENO, individually
and on behalf of a class of all other persons
similarly situated,

Plaintiff,

v.

ARGENT TRUST COMPANY, RYAN
SASSON, DANIEL BLUMKIN, IAN
BEHAR, DUKE ENTERPRISES LLC,
TWIST FINANCIAL LLC, BLAISE
INVESTMENTS LLC, and STRATEGIC
FINANCIAL SOLUTIONS, LLC,

Defendants.

Case No. 1:20-cv-09987-JGK

ECF Case

DECLARATION OF DAVID H. WILLIAMS

I, DAVID H. WILLIAMS, hereby declare under penalty of perjury as follows:

1. I am employed by Argent Trust Company (“Argent”) as Executive Vice President & Manager, Fiduciary Services. I am over twenty-one years of age and am authorized to make this Declaration on behalf of Argent and myself.

2. I submit this Declaration in connection with Defendants’ Motion to Compel Individual Arbitration and Stay the Case in the above-captioned matter.

3. This Declaration is based on my personal knowledge and upon Argent’s business records available to me in my role as Executive Vice President & Manager, Fiduciary Services.

4. The document attached as Exhibit A to this Declaration is a copy of the Strategic ESOP plan document, dated December 28, 2017 and effective May 1, 2017.

5. The document attached as Exhibit B to this Declaration is a copy of the Strategic Employee Stock Ownership Trust, dated December 28, 2017 and effective May 1, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 2, 2021


David H. Williams